

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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CHALAMO KAIKOV,

Plaintiff,

-against-

ARIHAY KAIKOV, DUSTIN BOWMAN, SHIRYAK,  
BOWMAN, ANDERSON, GILL & KADOCHNIKOV  
LLP, PACIFIC 2340 CORP., ROYAL A&K REALTY  
GROUP INC., A&E.R.E. MANAGEMENT CORP., NY  
PRIME HOLDING LLC, AG REALTY BRONX  
CORP., JOHN and JANE DOE 1-19, and XYZ  
CORPORATION 1-10,

Defendants.  
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Docket No.: 19-CV-2521

**DECLARATION OF  
DANIEL S. HALLAK IN  
OPPOSITION TO  
PLAINTIFF'S MOTION FOR A  
PRELIMINARY INJUNCTION  
AND TEMPORARY  
RESTRAINING ORDER**

I, Daniel S. Hallak, an attorney duly admitted to practice law in this Court hereby declares, under penalty of perjury, as follows:

1. I am an attorney with The Russell Friedman Law Group, LLP and counsel for Defendants ARIHAY KAIKOV, PACIFIC 2340 CORP., ROYAL A&K REALTY GROUP INC., A&E.R.E. MANAGEMENT CORP., NY PRIME HOLDING LLC, AND AG REALTY BRONX CORP. (hereinafter, collectively referred to as "Kaikov Defendants") in this case. I make this declaration based upon my own personal knowledge, review of pertinent documents, and upon information and belief.

2. Attached hereto as **Exhibit "A"** is a true and accurate copy of the deeds to 567 Jerome Street, Brooklyn, New York 11207.

3. Attached hereto as **Exhibit "B"** is a true and accurate copy of the deed to 317 East 31st Street, Brooklyn, New York 11226.

4. Attached hereto as **Exhibit “C”** is a true and accurate copy of the deeds to 118-36 219th Street, Jamaica, New York 11411.

5. Attached hereto as **Exhibit “D”** is a true and accurate copy of the deeds to 118-26 220th Street, Jamaica, New York 11411.

6. Attached hereto as **Exhibit “E”** is a true and accurate copy of the deeds to 909 Elton Street, Brooklyn, New York 11208.

7. Attached hereto as **Exhibit “F”** is a true and accurate copy of the deed to 280 West 127th Street, New York, New York 10027.

8. Attached hereto as **“Exhibit “G”** is a true and accurate copy of the deed to 844 Herkimer Street, Brooklyn, New York 11233

9. Attached hereto as **“Exhibit H”** is a true and accurate copy of the deed to 243 Buttrick Avenue, Bronx, New York 10465.

10. Attached hereto as **“Exhibit I”** 2020 is a true and accurate copy of the deeds to 406 East 94th Street, Brooklyn, New York 11212.

11. Attached hereto as **“Exhibit J”** is a true and accurate copy of the deeds to 905 Mother Gaston Boulevard, Brooklyn, New York 11212.

12. Attached hereto as **“Exhibit K”**, upon information and belief, are the fraudulent deeds filed by Plaintiff’s son concerning 905 Mother Gaston Boulevard, Brooklyn, New York 11212.

13. Attached hereto as **“Exhibit L”** is a true and accurate copy of the corporate documents for Royal A&K Realty.

14. Attached hereto as **“Exhibit M”** is a true and accurate copy of 911 Realty’s tax returns for the year of 2015.

15. Attached hereto as “**Exhibit N**” is a true and accurate copy of 911 Realty’s tax returns for the year of 2017

16. Attached hereto as “**Exhibit O**” is a true and accurate copy of an email dated January 16, 2020 to Defendant Arihay, indicating that the loan on the 844 Herkimer Street property is due to mature on February 1, 2020.

**WHEREFORE**, due to the arguments set forth in the accompanying memorandum of law, it is respectfully requested that this Court deny Plaintiff’s Motion for a Preliminary Injunction pursuant to FRCP 65 and Plaintiff’s Motion for a Temporary Restraining Order.

Dated: Lake Success, New York  
January 16, 2020

/s/ Daniel S. Hallak  
Daniel S. Hallak